

### **Amendments to the Claims**

This listing of claims replaces all prior versions and listings of claims in the application:

1. (Canceled)

2. (Currently Amended) A system for implementing a compliance program in a financial institution, comprising:

a list database for storing material information regarding a plurality of entities that is known to said financial institution, the material information regarding the plurality of entities being partitioned into a Grey List and a Restricted List; and

a list manager module executing on at least one programmable processor, said list manager receiving a compliance query from an affiliate of the financial institution having a status, said list manager providing a compliance response to said affiliate based on said plurality of entities and according to said status of said affiliate;

an export interface module executing on the at least one programmable processor and in communication with the list manager module, the export interface module receiving the material information regarding the plurality of entities and exporting the material information regarding the plurality of entities to a trading system; and

an input interface module executing on the at least one programmable processor and in communication with the list manager module, the input interface module receiving information from the trading system and forwarding the information to the list manager module.

~~wherein said material information regarding the plurality of entities is partitioned into a Grey List and a Restricted List.~~

3. (Original) The system of claim 2, wherein said affiliate is an employee, said compliance query is a request by said employee to trade a security of an entity and said compliance response is a

denial of said request to trade if said entity is included in the partition of said plurality of entities included in said Restricted List.

4. (Original) The system of claim 2, wherein said affiliate is a trader, said compliance request is a request to trade a security of an entity and said compliance response includes at least one of said plurality of entities included in said Restricted List and a clearance code.

5. (Original) The system of claim 4, wherein associated with said at least one of said plurality of entities is a transaction type and said request to trade has an activity type and wherein said clearance code denies said request to trade based on said transaction type and said activity type.

6. (Original) The system of claim 5, wherein said transaction type is selected from a group including mergers and acquisitions, initial public offerings and tender offers.

7. (Original) The system of claim 5, wherein said activity type is selected from a group including principal activity, market making activity, positional trading activity and derivative trading activity.

8. (Original) The system of claim 2, wherein said affiliate is a supervisory analyst, said compliance request is a request to issue a report regarding an entity and said compliance response includes at least one of said plurality of entities included in a combination of said Restricted List and said Grey List.

9. (Original) The system of claim 8, wherein said compliance response includes at least one safe harbor provision that grants at least a portion of said compliance request.

10. (Original) The system of claim 9, wherein said grant of said portion of said compliance request is based on geography.

11. (Original) The system of claim 2, wherein said affiliate is a compliance officer, said compliance request is a request to view at least a portion of a combination of said Restricted List and said Grey List and said compliance response includes said portion of the combination of said restricted list and said Grey List.

12. (Original) The system of claim 11, wherein said compliance response includes for at least one of said plurality of entities included in said portion a clearance code and a transaction type.

13. (Original) The system of claim 11, wherein said compliance response includes for at least one of said plurality of entities included in said portion a safe harbor provision.

14. (Previously Presented) The system of claim 2, further comprising a surveillance system wherein said surveillance system receives said plurality of entities stored in said list database for monitoring trading activity in accordance with said compliance program.

15. (Previously Presented) The system of claim 2, wherein said list database receives said plurality of entities from a compliance officer in communications with said system.

16. (Previously Presented) The system of claim 2, wherein said list database receives at least a portion of said plurality of entities from a transaction information source.

17. (Previously Presented) The system of claim 2, wherein said list database receives positional information relating to said financial institution and wherein said compliance response is based on said positional information.

18. (Previously Presented) The system of claim 2, wherein said list database receives affiliate directorship information and wherein said compliance response is based on said affiliate directorship information.

19. (Canceled)

20. (Currently Amended) A method for implementing a compliance program in a financial institution, comprising the steps of:

storing a plurality of entities, said financial institution being associated with each of said plurality of entities;

partitioning said plurality of entities into a Grey List and a Restricted List;

receiving at a list manager module executing on at least one programmable processor a compliance query from an affiliate of the financial institution having a status; and

providing a compliance response to said affiliate based on said plurality of entities and according to said status of said affiliate;

receiving the material information regarding the plurality of entities at an export interface module executing on the at least one programmable processor;

exporting the material information regarding the plurality of entities from the export interface module to a trading system;

receiving at an input interface module executing on the at least one programmable processor information from the trading system; and

forwarding the information from input interface module to the list manager module.

21. (Original) The method of claim 20, wherein said affiliate is an employee, said compliance query is a request by said employee to trade a security of an entity and said compliance response is a denial of said request to trade if said entity is included in one of said plurality of entities included in said Restricted List.

22. (Original) The method of claim 20, wherein said affiliate is a trader, said compliance request is a request to trade a security of an entity and said compliance response includes at least one of said plurality of entities from said Restricted List that includes said entity and a clearance code.

23. (Original) The method of claim 22, wherein said at least one of said plurality of transactions have a transaction type and said request to trade has an activity type and wherein said clearance code denies said request to trade based on said transaction type and said activity type.

24. (Original) The method of claim 23, wherein said transaction type is selected from a group including mergers and acquisitions, initial public offerings and tender offers.

25. (Original) The method of claim 23, wherein said activity type is selected from the group including principal activity, market making activity, positional trading activity and derivative trading activity.

26. (Original) The method of claim 20, wherein said affiliate is a supervisory analyst, said compliance request is a request to issue a report regarding an entity and said compliance response includes at least one of said plurality of entities from a combination of said Restricted List and said Grey List that includes said entity.

27. (Original) The method of claim 26, wherein said compliance response includes at least one safe harbor provision that grants at least a portion of said compliance request.

28. (Original) The method of claim 27, wherein said grant of said portion of said compliance request is based on geography.

29. (Original) The method of claim 20, wherein said affiliate is a compliance officer, said compliance request is a request to view at least a portion of a combination of said Restricted List and said Grey List and said compliance response includes said portion of the combination of said Restricted List and said Grey List.

30. (Original) The method of claim 29, wherein said compliance response includes for at least one of said plurality of entities included in said portion a clearance code and a transaction type.

31. (Original) The method of claim 29, wherein said compliance response includes for at least one of said plurality of entities included in said portion a safe harbor provision.

32. (Currently Amended) The method of claim 20, further comprising the step of: monitoring trading activity in accordance with said compliance program based on said plurality of entities stored.

33. (Previously Presented) The method of claim 20, further comprising the step of: receiving said plurality of entities from a compliance officer.

34. (Previously Presented) The method of claim 20, further comprising the step of: receiving at least a portion of said plurality of entities from a transaction information source.

35. (Previously Presented) The method of claim 20, further comprising the steps of: receiving positional information relating to said financial institution; and providing said compliance response based on said positional information.

36. (Previously Presented) The method of claim 20, further comprising the steps of: receiving affiliate directorship information; and providing said compliance response based on said affiliate directorship information.

37. (Withdrawn) A system for monitoring trading activity of a trading system operated by a financial institution in accordance with a compliance program, said trading system receiving a trade request to trade a security of an entity, the system comprising;

a list database for storing a plurality of entities, said financial institution being associated with each of said plurality of entities;

wherein said trading system receives said plurality of entities from said list database and wherein said trading system allows said trade request if said entity is not included in said plurality of entities.

38. (Withdrawn) The system of claim 37, wherein said entity is included in at least one of said plurality of entities having a transaction type and said request to trade has an activity type and wherein said trading system allows said trade request based on said transaction type and said activity type.

39. (Withdrawn) The system of claim 38, wherein said transaction type is selected from group including mergers and acquisitions, initial public offerings and tender offers.

40. (Withdrawn) They system of claim 38, wherein said activity type is selected from a group including principal activity, market making activity, positional trading activity and derivative trading activity.

41. (Withdrawn) They system of claim 37, wherein said list database receives at least a portion of said plurality of entities from a transaction information source.

42. (Withdrawn) The system of claim 37, wherein said list database receives positional information relating to said financial institution and wherein said trading system denies said trade request based on said positional information.

43. (Withdrawn) They system of claim 37, wherein said list database receives affiliate directorship information and wherein said trading system denies said trade request based on said affiliate directorship information.

44. (Withdrawn) A method for monitoring trading activity of a trading system operated by a financial institution in accordance with a compliance program, the method comprising the steps of;

storing a plurality of entities, said financial institution being associated with each of said plurality of entities;

receiving a trade request to trade a security of an entity;

determining whether said entity is included in said plurality of entities; and

allowing said trade request if said entity is not included in said plurality of entities.

45. (Withdrawn) The method of claim 44, wherein said entity is included in at least one of said plurality of entities having a transaction type and said request to trade has an activity type and wherein the step of allowing said trade request includes the step of:

allowing said trade request based on said transaction type and said activity type.

46. (Withdrawn) The method of claim 45, wherein said transaction type is selected from a group including mergers and acquisitions, initial public offerings and tender offers.

47. (Withdrawn) The method of claim 45, wherein said activity type is selected from a group including principal activity, market making activity, positional trading activity and derivative trading activity.

48. (Withdrawn) The method of claim 44, further comprising the step of:

receiving at least a portion of said plurality of entities from a transaction information source.

49. (Withdrawn) The method of claim 44, further comprising the steps of:

receiving positional information relating to said financial institution; and

denying said trade request based on said positional information.

50. (Withdrawn) The method of claim 44, further comprising the steps of:

receiving affiliate directorship information; and

denying said trade request based on said affiliate directorship information.

51. (Currently Amended) A system for implementing a compliance program in a financial institution, comprising:

a list database that stores material information regarding a plurality of entities that are known to the financial institution, the material information including a Grey List, a Restricted List, and restriction information related to the entities on the Grey List and the Restricted List;  
**and**

a list manager module executing on at least one programmable processor that receives a compliance query from an affiliate of the financial institution, the list manager module configured to respond to the compliance query by retrieving and displaying the information stored in the list database that is responsive to the compliance query;



an export interface module executing on the at least one programmable processor and in communication with the list manager module, the export interface module receiving the material information regarding the plurality of entities and exporting the material information regarding the plurality of entities to a trading system; and

an input interface module executing on the at least one programmable processor and in communication with the list manager module, the input interface module receiving information from the trading system and forwarding the information to the list manager module.

52. (Currently Amended) A method for implementing a compliance program in a financial institution, comprising:

storing a plurality of entities in a list database, the financial institution being associated with each of said plurality of entities;

partitioning the entities stored in the list database into a Restricted List and a Grey List;

storing restriction information related to the entities on the Restricted List and the Grey List;

receiving at a list manager module executing on at least one programmable processor a compliance query from an affiliate of the financial institution; and

responding to the compliance query with restriction information stored in the list database that is responsive to the compliance query;

receiving the material information regarding the plurality of entities at an export interface module executing on the at least one programmable processor;

exporting the material information regarding the plurality of entities from the export interface module to a trading system;

receiving at an input interface module executing on the at least one programmable processor information from the trading system; and

forwarding the information from input interface module to the list manager module.

53. (New) The system of claim 2, further comprising a user interface module executing on the at least one programmable processor, the user interface module in communication with the list manager module and a plurality of access devices, at least two access devices providing different levels of access to the system.

54. (New) The system of claim 2, wherein the export interface module further exports the material information regarding the plurality of entities to a market data system external to the financial institution.